

EXHIBIT “B”

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

x

RICHARD GRAVINA, an individual; on behalf
of himself and all others similarly situated,

CASE NO.: 2:11-cv-01161-JFB-WDW

Plaintiff,

vs.

WELTMAN, WEINBERG & REIS CO.,
L.P.A., an Ohio Corporation; and JOHN AND
JANE DOES NUMBERS 1 THROUGH 25,

**DECLARATION OF WILLIAM F. HORN
IN SUPPORT OF MOTION FOR
PRELIMINARY APPROVAL OF CLASS
SETTLEMENT AGREEMENT**

Defendants.

x

I, William F. Horn, of full age, hereby certify as follows:

1. I am an attorney duly admitted to practice law in the State of New York and in the United States District Court for the Eastern, Southern, Northern, and Western Districts of New York. I am co-counsel of record for Plaintiff, RICHARD GRAVINA, in the above-entitled action and, in that regard, I submit this affidavit in support of the Parties' Joint Motion for an Order Granting Preliminary Approval of Class Action Settlement.

2. I am a member in good standing of the Bar of the State of New York and I am licensed to practice before all courts in the State. I am also admitted to practice law before the United States District Courts for the Southern District of New York since 1997, the United States District Courts for the Northern District of New York and Western District of New York since 2010, and before the United States Court of Appeal for the Second Circuit since 2012. I have been admitted to practice law in the State of New York since 1995 and have remained a member in good standing since that time.

3. I am also admitted to practice before the bar of the United States District Courts for the Northern District of Illinois and the Eastern District of Michigan.

4. My license to practice law has never been suspended or revoked by the State of New York or any court. There are no disciplinary proceedings pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

5. I received my bachelor's degree from the University of Pennsylvania in 1983 and graduated the Brooklyn Law School in 1994. I also hold a Master of Science degree in Real Estate Development, which I earned from New York University in 1994.

6. Prior to attending law school, I worked in the finance and real estate sectors. From 1989 to 1991, I worked for Baring Institutional Realty Advisors, Inc. where I performed lease analyses and prepared cash-flow projections for businesses. From 1984 to 1987, I worked for Bear Stearns and Company, Inc., as a credit analyst determining the financial creditworthiness for major financial institutions and Manufacturers Hanover Trust Company as an international banking officer.

7. Just following and prior to my graduation from law school and admission to the New York bar, I worked as a legal consultant and contract attorney for several large multinational law firms and corporations. Furthermore, from 2004 to 2009, I practiced law at Skadden, Arps, Slate, Meagher & Flom, LLP in both its Real Estate and Litigation departments, where I performed all activities relating to large real estate transactions and trial preparation in multi-million dollar class-action lawsuits. From 2000 to 2004, I worked as a contract attorney for, among others, Schulte, Roth & Zabel, LLP and Solomon Zauderer, Ellenhorn, Frischer & Sharp, where I advised their respective Corporate and Securities Litigation groups concerning trial strategy. From 1998 to 2000, I served as a corporate associate at Simpson, Thacher &

Bartlett, LLP where I practiced securities law. From 1994 to 1998, I was engaged as a solo practitioner and consultant handling a variety of real estate litigation matters which included practicing before the U.S. Bankruptcy Court and the U.S. Immigration Court.

8. In connection with my foregoing professional and legal work experience, I have worked on a variety of complex commercial and consumer matters. Since leaving Skadden Arps in 2009, I have been engaged as a solo practitioner and have a growing practice representing consumers on claims under the Fair Debt Collection Practices Act, 15 U.S.C. §§1692, *et seq.* I am now, and have been involved in actions brought solely as individual claims as well as class actions. My cases have been filed in the Eastern District of New York, Western District of New York, Northern District of New York, Eastern Southern District of New York, District of Pennsylvania, Northern District of Illinois, the Southern and Central Districts of California, the District of Kansas, the Southern District of Florida and the Eastern District of North Carolina.

9. I have been certified to act as class counsel in the following consumer class action lawsuits:

- *Anderson, et al. v. Nationwide Credit, Inc.*, U.S. District Court, E.D.N.Y. Case No. 2:08-cv-01016-LDW-ETB;
- *Harrigan v. Receivables Performance Management, LLC*, U.S. District Court, N.D.N.Y. Case No. 8:09-cv-01351-RFT;
- *Gravina v. United Collection Bureau, Inc.*, U.S. District Court, E.D.N.Y. Case No. 2:09-cv-04816-LDW-AKT;
- *Gravina, et al. v. National Enterprise Systems, Inc.*, U.S. District Court, E.D.N.Y. Case No. 2:09-cv-02942-JFB-GRB;
- *Anderson, et al. v. Nationwide Credit, Inc.*, U.S. District Court, E.D.N.Y. Case No. 2:10-cv-03825-LDW-ETB;
- *Pawelczak v. Bureau of Collection Recovery, LLC*, U.S. District Court, N.D. Ill. Case No. 1:11-cv-01415;

- *Zirogiannis v. Professional Recovery Consultants, Inc.*,
U.S. District Court, E.D.N.Y. Case No. 2:11-cv-00887-LDW-ETB;
- *Lagana v. Stephen Einstein & Associates, P.C. et al.*,
U.S. District Court, S.D.N.Y. Case No. 1:10-cv-04456-KMW-GWG; and
- *Castellano, et al. v. Global Credit & Collection Corporation*,
U.S. District Court, E.D.N.Y. Case No. 2:10-cv-05898-JFB-WDW.

In accordance with 28 U.S.C. §1746, I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this 4th day of June, 2012, at Fresh Meadows, New York.

s/ William F. Horn

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One of the Attorneys for Plaintiff, Richard Gravina, and all others similarly situated